

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS PENSION FUND)
AND WELFARE FUNDS,)

Plaintiff,)

v.)

WOLF ENTERPRISES, INCORPORATED)
an Illinois corporation not in good standing and)
DARREN ROMY,)

Defendants.)

No. 07 C 5976

Judge Andersen

Magistrate Judge Mason

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on October 23, 2007 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon WOLF ENTERPRISES, INC., on October 29, 2007 and a copy of the proof of service was filed with the court on November 6, 2007.
3. An Amended Complaint was filed on January 31, 2008 to add DARREN ROMY, Individually.
4. Service was made upon DARREN ROMY, Individually on February 15, 2008 and a copy of the proof of service was filed with the court on February 26, 2008.

5. Defendants are now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$10,113.93 Pension Installment Note
\$13,793.98 Welfare Installment Note
\$925.00 Attorneys fees
\$436.00 Court costs
\$25,268.91

WHEREFORE, Plaintiffs pray for the entry of judgment against Defendant, WOLF ENTERPRISES, INC., an Illinois corporation not in good standing and DARREN ROMY, Individually, jointly and severally, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$25,268.91.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS WELFARE AND
PENSION FUNDS

By: _____

One of Its Attorneys

JOHN J. TOOMEY
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